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DEPT. OF TRANSPORTATION
DOCKETS

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July 11, 2002

National Highway Traffic Safety Administration
Docket Management Facility
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590

Re: Docket No. NHTSA-02-12150; "Confidential Business Information"

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To Whom It May Concern:

Thank you for the opportunity to share our position on the proposed rule that is a result of the Transportation Recall Enhancement, Accountability & Documentation Act (TREAD).

Specifically, the rule that would require owners or operators of fleets to submit quarterly "field reports" to the NHTSA regarding the "failure, malfunction, lack of durability or other performance problems of a motor vehicle...produced by that manufacturer, regardless of whether verified or assessed to be lacking in merit."

Enterprise Rent-A-Car Company opposes this proposed rules concerning "Confidential Business Information"

We appreciate and understand the reasoning behind the proposed rule, which is to prevent situations similar to those surrounding the Firestone/Ford safety problems. However, because Enterprise Rent-A-Car Company operates and manages a fleet of 175,000 motor vehicles across the United States, this rule would create a new administrative burden on our industry with little, if any, material benefit to either the consumer or the motor vehicle industry.

Moreover, this rule also would make these quarterly reports public with no confidentiality or protection from public consumption. Enterprise believes that this could unintentionally lead to certain proprietary information being made available to variety of entities, including those with whom we compete.

Enterprise Rent-A-Car Company urges the NHTSA to reconsider this rule. If, however, the process of compiling and submitting the "field reports" is deemed necessary, these reports should at a minimum be treated as confidential and should be protected.



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Again, thank you for your consideration of our position.

Sincerely,

A handwritten signature in black ink, appearing to read 'SB' or 'Steve Bloom', written over the word 'Sincerely,'.

Steve Bloom
Vice President
Fleet Services
Enterprise Rent-A-Car Company